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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADEDEJI SHAMONDA,

Defendant.

Case No.: 3-24-cr-00319 TSH

STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE STATUS
CONFERENCE AND EXCLUDE TIME
FROM UNDER THE SPEEDY TRIAL
ACT

There is a status conference scheduled in this case for November 20, 2025 at 9:30 am. The parties, in the interests of efficiency, stipulate and respectfully request that the status conference be continued to January 8, 2026 or to a subsequent date deemed appropriate by the Court. The reason for this request is to allow defense counsel to review additional, recently-produced discovery in this case and to engage in continued discussions with government counsel about a potential resolution.

It is further stipulated by and between counsel for the United States and counsel for defendant ADEDEJI SHAMONDA, that time be excluded under the Speedy Trial Act from November 20, 2025 through January 8, 2026 (or the date set for the next status hearing by the

1 Court). The government and counsel for the defendant have agreed that time be excluded under
 2 the Speedy Trial Act so that defense counsel can continue to prepare, including by reviewing
 3 the discovery already produced. For this reason, the parties stipulate and agree that excluding
 4 time until January 8, 2026 (or the date set for the next status hearing by the Court) will allow
 5 for the effective preparation of counsel. *See* 18 U.S.C. §3161(h)(7)(B)(iv). The parties further
 6 stipulate and agree that the ends of justice served by excluding the time from November 20,
 7 2025 through January 8, 2026 (or the date set for the next status hearing by the Court) from
 8 computation under the Speedy Trial Act outweigh the best interests of the public and the
 9 defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(A), (B)(iv).

10 The undersigned attorney certifies that he has obtained approval from government
 11 counsel to file this stipulation and proposed order.

12 IT IS SO STIPULATED.

13 DATED: November 18, 2025

/s/ Michael G. Lagrama
 14 MICHAEL G. LAGRAMA
 15 Assistant United States Attorney

16 DATED: November 18, 2025

/s/ Samuel O'Keefe
 17 SAMUEL O'KEEFE
 18 DOUGLAS I. HORNGRAD
 Counsel for Defendant Adedeji Shamonda

19 ~~PROPOSED~~ ORDER

20 Based on the parties' stipulation and for good cause shown, the status hearing set for
 21 November 20, 2025 is continued to January 8, 2026, at 9:30 a.m. Based on the parties'
 22 stipulation and for good cause shown, the Court also finds that failing to exclude the time from
 23 November 20, 2025 through January 8, 2026 would unreasonably deny defense counsel and the
 24 defendant the reasonable time necessary for effective preparation, taking into account the
 25 exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends
 26 of justice served by excluding the time from November 20, 2025 through January 8, 2026 from
 27 computation under the Speedy Trial Act outweigh the best interests of the public and the
 28 defendant in a speedy trial.

1 Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time
2 from November 20, 2025 through January 8, 2026 shall be excluded from computation under
3 the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

4 IT IS SO ORDERED.

5
6 DATED: November 18, 2025


HON. THOMAS S. HIXSON
United States Magistrate Judge